

IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: Tracey Moreland)
Debtor) Case # 16-38749
) Chapter 13
) Judge Hollis JOLIET

To:

Via US Mail - see attached service list

Via electronic service to:

Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov

Glenn B Stearns mcguckin_m@lisle13.com

Michael N Burke on behalf of Creditor MidFirst Bank bk_il_notice@fisherandshapirolaw.com

Cari A Kauffman on behalf of Creditor AMERICREDIT FINANCIAL SERVICES, INC. d/b/a GM Financial ckauffman@sormanfrankel.com, dfrankel@sormanfrankel.com

Lesley D Lueke on behalf of Creditor MidFirst Bank

bkecfinbox@alridgeppte.com, llueke@ecf.courtdrive.com

NOTICE OF MOTION

Please take notice that on July 12, 2019 at 10:45 am I shall bring the attached motion for hearing before Honorable Judge Hollis, or whomever is sitting in her stead, at Joliet City Hall, 150 W Jefferson St 2nd Fl, Joliet, IL.

CERTIFICATE OF SERVICE

I hereby certify that I served this notice on the parties listed on the attached service list by placing same in addressed, stamped envelopes and mailing via US Mail on 6/11/2019 and to the parties listed above via electronic service on 6/11/2019.

S/ Julie M Gleason ARDC 6273536

Gleason and Gleason
77 W Washington Ste 1218
Chicago, IL 60602
312-578-9530

Northern District of Illinois
Eastern Division
Tue Jun 11 13:02:06 CDT 2019

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

AT&T Mobility II LLC
%AT&T SERVICES INC.
KAREN A. CAVAGNARO PARALEGAL
ONE AT&T WAY, SUITE 3A104
BEDMINSTER, NJ. 07921-2693

Abc Credit & Recovery
4736 Main St Ste 4
Lisle, IL 60532-1986

AmeriCredit Financial Services, Inc. dba GM
P O Box 183853
Arlington, TX 76096-3853

Amita Health Adventist Medical Center
PO Box 9246
Oak Brook, IL 60522-9246

Atg Credit
1700 W Cortland St Ste 2
Chicago, IL 60622-1131

Barclays Bank Delaware
Po Box 8803
Wilmington, DE 19899-8803

Capital One, N.A.
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

Dept Of Ed/navient
Po Box 9635
Wilkes Barre, PA 18773-9635

Doctor Green Services
ABC Credit & Recovery Services, Inc
PO Box 3722
Lisle, IL 60532-8722

Enhanced Recovery Co L
8014 Bayberry Rd
Jacksonville, FL 32256-7412

Gm Financial
Po Box 181145
Arlington, TX 76096-1145

Illinois Dept of Employment Security
Bankruptcy Unit Collection Subdivis
33 S State St 10th Floor
Chicago, IL 60603-2804

Keynote Consulting
220 West Campus Drive
Arlington Heights, IL 60004-1498

Kohls/capone
N56 W 17000 Ridgewood Dr
Menomonee Falls, WI 53051-7096

Lakewood Falls Phase 5 HOA
c/o Keough & Moody
114 E Van Buren Ave
Naperville, IL 60540-5183

Lakewood Falls Phase 5 Homeowners Association
c/o Keough & Moody, P.C.
114 East Van Buren Avenue
Naperville, IL 60540-5183

Merchants Credit Guide
223 W Jackson Blvd Ste 4
Chicago, IL 60606-6914

MidFirst Bank
MidFirst Bank
999 N.W. Grand Blvd
Oklahoma City, Oklahoma 73118-6051

Midland Mtg/midfirst
999 Nw Grand Blvd
Oklahoma City, OK 73118-6051

Nationwide Credit & Co
815 Commerce Dr Ste 270
Oak Brook, IL 60523-8852

Navient Solutions, Inc. on behalf of
Department of Education Loan Services
PO BOX 9635
Wilkes-Barre, PA 18773-9635

Portfolio Recovery Ass
120 Corporate Blvd Ste 1
Norfolk, VA 23502-4952

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Quantum3 Group LLC as agent for
Crown Asset Management LLC
PO Box 788
Kirkland, WA 98083-0788

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Vistana PSL Inc
Vistana Portfolio Services
Attn LSA
9002 San Marco Court
Orlando, FL 32819-8600

Julie M Gleason
Gleason & Gleason LLC
77 W Washington Suite 1218
Chicago, IL 60602-3246

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Tracey Moreland
356 Reston Cr
Romeoville, IL 60446-5069

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Portfolio Recovery Associates, LLC
Successor to
DELL FINANCIAL SERVICES, LLC
POB 41067
Norfolk, VA 23541

(d) Portfolio Recovery Associates, LLC
Successor to COMENITY BANK (AVENUE)
POB 41067
Norfolk, VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) AMERICREDIT FINANCIAL SERVICES, INC. d/b/a	(u) MidFirst Bank	End of Label Matrix
		Mailable recipients 35
		Bypassed recipients 2
		Total 37

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MOTION TO MODIFY PLAN

Now come Debtor, by and through her attorney, Julie Gleason of Gleason and Gleason, and in support of this motion to modify plan states the following:

1. That this Court has jurisdiction over this proceeding pursuant to 28 USC 1334 and this is a core proceeding under 28 USC 157(b)(2).
2. Debtor filed for the above captioned case under Section 13 of the US Bankruptcy Code on 12/8/2016.
3. Debtors' case was confirmed on 2/3/2017.
4. Debtors' plan requires them to make payments of \$430.00 a month for 60 months, which would pay 100% to unsecured creditors.
5. Debtor suffered a heart attack and fell behind on her payments to the trustee. She is back to work and has resumed trustee payments. However, debtor requires modification to her plan to defer the default to the trustee.
6. Debtor's plan will still complete within 60 months and pay 100% to unsecured creditors while keeping payment at \$430 a month if deferment is granted.

Wherefore, Debtor prays this Honorable Court enter an order to modify plan to defer the default owed to trustee through July 2019, keeping payment to trustee at \$430, paying 100% to her unsecured debt, and such relief this Court deems necessary.

Respectfully Submitted,

S/ Julie M Gleason ARDC 6273536

Gleason and Gleason
77 W Washington Ste 1218
Chicago, IL 60602